

22 July, 2005

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	WT Docket No. 05-235
)	
)	RM-10782, RM-10783, RM-10784,
Amendment of Part 97 of the Commission's Rules)	RM-10785, RM-10786 , RM-
10787,		
To Implement WRC-03 Regulations Applicable to)		RM-10809, RM-10810, RM-10867,
Requirements for Operator Licenses in the)	RM-10870
Amateur Radio Service		

To: The Commission

I, Leland R. Harrell, hereby respectfully submit my comments in response to the *Notice of Proposed Rule Making and Order* - MOST SPECIFICALLY DIRECTED TOWARDS YOUR PROPOSED ORDER TO ELIMINATE THE MORSE CODE TESTING REQUIREMENTS FROM THE EXAMINATION FOR THE **AMATEUR EXTRA CLASS OPERATOR LICENSE**.

First, I would like to commend the Commission on moving forward with actions that should enhance efforts to encourage participation in Amateur Radio. I feel that most of the proposed changes will contribute to bringing this Service more in alignment with 21st century technology, and will help bring us closer to the forefront in good international relations. *Thank you!*

My comments will begin by saying that I am **opposed to the elimination of Morse Code testing for the Amateur Extra Class License (Element 4)** – some of the main reasons follow.

- 1) **Degradation** - I think elimination of code testing will erode the quality of this advance class of licensing and operations. If the challenge is removed (or reduced), so is the incentive to upgrade from the less-advanced class of licenses.
- 2) **Impaired International communications** – By removing the Morse Code testing requirement, I feel that this causes the wrong message to those who interpret this as saying that Morse Code is not important any more, and could cause the gradual loss of the ability to efficiently communicate with a person who speaks a different language. I have personally heard on the air statements like “the code is dead!” or “CW is dead” – in reference to the FCC possibly removing the Code testing requirements. **Please be reminded** that the International Morse Code language contains many “pro-signs” and other symbols which have a common meaning around the globe – no spoken language barriers to delay or stop messages from getting through. In other words, I don’t need to learn Spanish, and my friend in Mexico

does not need to know English, to communicate over the radio. We do it with *Internation Morse Code*!

- 3) **Vague and notional reasons and basis in the Summaries and Discussion sections of the Proposal** – For example, a comment in the proposal which is related to the belief that (I summarize) *the elimination of the Code test if adopted, would encourage people who are interested to become amateur radio operators* – is not a valid assumption in my opinion. I think if a person is interested enough to join our proud ranks and earn the privilege to become a licensed radio operator, the 5 word-per-minute Code test would not prevent this from happening.

...and, my response to a Commission comment in III.A.19 (page 11) that “*we are not persuaded that it is in the public interest to require examinees to demonstrate an ability to exchange messages in one particular communications technology when the amateur service rules do not require operators to use this technology...*”, is in my opinion not a clear basis that can be used as a reason for eliminating the Code test. Let me illustrate by saying that there are questions in the question pool such as **E6D – Vidicon and cathode-ray tube devices, CCD’s, liquid crystal displays**, etc., and in **E9D - Space and satellite communications antennas**... none of which are required to be used by operators, but I would think that neither of these two questions would be removed from the exam because of that!

And finally...

- 4) **Precedent Setting** – If you eliminate Morse Code testing, what’s next – changing or eliminating some of the harder questions on the written test?

I am also NOT in favor of the Commission making reference to (and using as a basis for change) that something in the “international requirements” for a particular proficiency has been eliminated. When I hear that, I feel like we as a Nation are followers rather than leaders.

In summary....

Please retain the Morse Code testing requirement rule for the Amateur Extra Class Element 4 examination. I am looking forward to upgrading to Extra Class, and would like to know that, other than a few more frequencies, I also have the distinction of having passed the proficiency test for Morse Code!

I have tried to articulate my comments to the best of my abilities. If I misconstrued or misquoted anything, it was not intentional, and I apologize in advance.

I would like to thank the Commission again for taking actions in the right direction in most cases, and for helping us regulate this fine Radio Service. I hope the Commission reads these comments and does the right thing.

Sincerely,

Leland R. Harrell K5BBJ